

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
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**STIPULATION REGARDING THE FILING OF OBJECTIONS TO CERTAIN CLAIMS  
FILED BY THE STATE OF MICHIGAN**

The City of Detroit, Michigan (the “City”) and the State of Michigan (the “State”), by and through their undersigned counsel, file this stipulation regarding the filing of objections to certain claims filed by the State (the “Stipulation”), stating as follows.

1. The State, via various state departments, filed proofs of claim numbered 3725, 3726, 3748, 3749, 3750, and 3756 (the “State Claims”) on June 2, 2014.

2. The State categorized the State Claims as Administrative Claims<sup>1</sup>. The City disagrees with this categorization.

3. Pursuant to the Plan, the bar date for filing objections to Administrative Claims is 150 days after the Effective Date, or May 9, 2015 (“Administrative Claims Objection Bar Date”). Plan II.A.2. The City does not believe that the Administrative Claims Objection Bar Date applies to the State Claims because the Bar Date Order provides that “all administrative claims under section 503(b) of the Bankruptcy Code, other than 503(b)(9) claims and the administrative portion of Rejection Damages Claims, shall not be deemed proper if asserted by

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<sup>1</sup> Capitalized terms not otherwise defined shall have the same meaning ascribed to them in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (the “Plan”).

proof of claim” (Bar Date Order, ¶ 5), and the State filed the State Claims using a proof of claim form. The State disagrees with the City’s position.

4. The City and the State are working toward the resolution of the State Claims.

5. The City does not agree that the Administrative Claims Objection Bar Date applies to the State Claims. However, in the abundance of caution, and at the State’s request, the City and the State agree that the City may object to the State Claims until July 8, 2015

6. The City and the State agree that notwithstanding anything in this Stipulation, the City and the State each reserve all their arguments as to the State Claims, including that (i) the State agrees this Stipulation shall not be deemed to support in any way an argument that the State Claims are Administrative Claims or that the Administrative Claims Objection Bar Date applies to the State Claims and (ii) the City’s arguments that the State Claims are not Administrative Claims and the Administrative Claims Objection Bar Date does not apply to them are not affected by this Stipulation. The State reserves all of its other rights as to the State Claims, and the City reserves all of its rights as to the State Claims.

WHEREFORE, the City and the State stipulate and agree that the City may object to the State Claims through and including July 8, 2015.

<p><b>LAMBERT LESER</b></p> <p>By: <u>/s/ Rozanne M. Giunta (w/ consent)</u>  Rozanne M. Giunta  309 Davidson Bldg.  Bay City, MI 49707  Phone: (989) 893-3517  rgiunta@lambertleser.com</p> <p><i>Counsel to the State of Michigan</i></p>	<p><b>FOLEY &amp; LARDNER, LLP</b></p> <p>By: <u>/s/ John A. Simon</u>  John A. Simon (P61866)  Tamar N. Dolcourt (P73425)  Leah R. Imbrogno (P79384)  500 Woodward Ave., Ste. 2700  Detroit, MI 48226  Phone: (313) 234-7100  jsimon@foley.com  tdolcourt@foley.com  limbrogno@foley.com</p> <p><i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: May 7, 2015